

(Effective from 15th May, 2015)

Vide Notification Dated January 15, 2015 published in official gazette, Securities and Exchange Board of India (SEBI) has notified the SEBI (Prohibition of Insider Trading) Regulation, 2015 (hereinafter referred to as "Revised Regulation or Regulation"). The revised Regulation will come into force w.e.f. May 15, 2015.

In view of the fact that the Revised Regulation will come into force by the date as stated above, it is necessary for the Company to revise the existing Code and substitute the same with the Revised Code.

OBJECTIVE:

To define a set of rules to be followed by the Company, Directors and the Designated Persons and to set forth policies, procedures and monitoring adherence to the rules for prevention of Insider Trading in the Securities of the Company.

1 DEFINITIONS:

- 1.1 "Act" means the Securities and Exchange Board of India Act, 1992.
- 1.2 "Board" means the Securities Exchange Board of India.
- 1.3 "Code" or "Code of Conduct" shall mean the Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of trading by insiders of **HISAR METAL INDUSTRIES LIMITED** as amended from time to time.
- 1.4 "Company" means HISAR METAL INDUSTRIES LIMITED (**HMIL**).
- 1.5 "Compliance Officer" means any senior officer, designated so and reporting to the Reporting Officer, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information, monitoring of trades and the implementation of the Codes specified in these regulations under the overall supervision of the Board.
- 1.6 "Connected Person" shall the meaning assigned to it under the Regulations.



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- 1.7 “Dealing in Securities”** means an act of subscribing, buying, selling or agreeing to subscribe to buy, sell or deal in the securities of the Company either as principal or agent.
- 1.8 “Designated Person(s)’ shall include:**
- (i) Key Managerial Person(s);
 - (ii) every employee in the grade of Assistant General Manager, Manager, Dy. Manager and above;
 - (iii) every employee in the finance, accounts, sales & marketing, secretarial and legal department of the Company;
 - (iv) such other employee of the Company as may be notified by the Compliance Officer, from time to time, with approval of the Board; and
 - (v) immediate relative of above mentioned person(s).
- 1.9 “Director”** means a member of the Board of Directors of the Company.
- 1.10 “Employee”** means every employee of the Company including the Directors in the employment of the Company.
- 1.11 “Generally available Information”** means information that is accessible to the public on a non-discriminatory basis.
- 1.12 “Immediate Relative”** means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities
- 1.13 “Insider”** means any person who is:
- (i) a connected person; or
 - (ii) in possession of or having access to Unpublished Price Sensitive Information.
- 1.14 “Key Managerial Person”** means person as defined in Section 2(51) of the Companies Act, 2013
- 1.15 “Promoter”** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof:
- 1.16 “Reporting Officer”** means the Chairman of the Board.
- 1.17 “Securities”** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund;



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- 1.18 "Takeover regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
- 1.19 "Trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly
- 1.20 "Trading Day"** means a day on which the recognized stock exchanges are open for trading;
- 1.21 "Unpublished Price Sensitive Information"** means: means any information, relating to the Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:
- (i) financial results ;
 - (ii) dividends ;
 - (iii) change in capital structure ;
 - (iv) mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions ;
 - (v) changes in key managerial personnel ; and
 - (vi) material events in accordance with the listing agreement.
- 1.22 "Regulations"** shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.
- 1.23 "Specified Persons"** means the Directors, connected persons, the insiders, the Designated Employees and the promoters and immediate relatives are collectively referred to as Specified Persons.

Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation.

2. APPLICABILITY:

This Code shall apply to all Insiders as defined at 1.13 including Directors, Key Managerial Persons, Designated Persons and other Specified Persons.

3. DUTIES OF THE COMPLIANCE OFFICER:

- 3.1** The Compliance Officer shall be responsible for:

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- ❖ Compliance of policies, procedures, maintenance of records
- ❖ Monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information as set forth in this Code and applicable laws
- ❖ Decide in consultation with the Reporting Officer, the Designated Persons to be covered by this Code.
- ❖ Report to the Board, in particular to the Chairman of the Audit Committee or to the Chairman of the Board at such frequency as may be stipulated by the Board regarding implementation of the provisions contained in this Code.
- ❖ Pre-clearing of the proposed trading in Securities of HMIL by the Designated Persons
- ❖ Monitoring of Trading in Securities of HMIL and the implementation of this Code under the overall supervision of the Board
- ❖ Determining of closing and re-opening of Trading Window
- ❖ Approving and Monitoring of trading plan
- ❖ Undertaking other responsibilities as assigned under this Code or under the Regulations.

3.2 The Compliance Officer shall assist all employees in addressing any clarifications regarding the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct.

4. PRESERVATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION:

4.1 Confidentiality of Unpublished Price Sensitive Information and Chinese Walls

- (i) The Specified Persons shall maintain the confidentiality of all Unpublished Price Sensitive Information. The Specified Persons shall not pass on such information to any person, directly or indirectly.
- (ii) The Unpublished Price Sensitive Information is to be handled on a "need-to know" basis, i.e. Unpublished Price Sensitive Information should be communicated only to those Designated Persons and/or to such other persons who need the information in furtherance of their legitimate purpose, performance of duties or discharge of their legal obligation and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.



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4.2 Chinese Walls:

- (i) To prevent the misuse of Unpublished Price Sensitive Information, HMIL shall adopt a “Chinese Wall” policy which separates those areas of HMIL which routinely have access to confidential information and considered to be “inside areas”, from other departments providing support services, considered to be ‘public areas’.
- (ii) The Designated Persons in the inside areas shall not communicate any Unpublished Price Sensitive Information to anyone in the public areas.
- (iii) In exceptional circumstances, the Designated Persons from the public areas may be brought to ‘cross the wall’ in furtherance of legitimate purpose, performance of duties or discharge of legal obligations and given the Unpublished Price Sensitive Information on a ‘need-to know’ basis upon intimation to the Compliance Officer.

5 TRADING PLAN BY INSIDERS:

5.1 Trading Plan

An Insider shall be entitle to formulate a trading plan for dealing in securities of the Company and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.

5.2 Trading Plan shall:-

- a. not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
- b. not entail trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the issuer of the securities and the second trading day after the disclosure of such financial results;
- c. entail trading for a period of not less than twelve months;
- d. not entail overlap of any period for which another trading plan is already in existence;
- e. set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
- f. not entail trading in securities for market abuse.



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5.3 The Compliance Officer shall consider the Trading Plan made as above and shall approve it forthwith. However, he shall be entitled to take express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per provisions of the Regulations.

5.4 The Trading Plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

However, the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, the Insider is in possession of any Unpublished Price Sensitive Information and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Plan shall be deferred until such Unpublished Price Sensitive Information becomes generally available information. Further, the Insider shall also not be allowed to deal in securities of the Company, if the date of trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

5.5 Upon approval of the trading plan, the Compliance Officer shall notify the plan to the stock exchanges on which the securities are listed.

6 TRADING WINDOW AND WINDOW CLOSURE:

6.1 Trading Window

- (i) The trading period, i.e. the trading period of the stock exchanges, called "**Trading Window**", is available for trading in the Company's securities
- (ii) The Trading Window shall be, *inter alia*, closed 7 days prior to and during the time the Unpublished Price Sensitive Information is published.
- (iii) When the Trading Window is closed, the Director/Designated Persons shall not trade in the Company's securities in such period.
- (iv) All Directors/Designated Persons shall conduct all their dealings in the securities of the Company only in a valid Trading Window and shall not deal in any transaction involving the purchase or sale of the Company's securities during the periods when



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the Trading Window is closed, as referred to in Point No. (ii) above or during any other period as may be specified by the Company from time to time.

- (v) In case of ESOPs, exercise of option may be allowed in the period when the Trading Window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when trading is closed.

6.2 The Compliance Officer shall intimate the closure of Trading Window to all the Directors/Designated Persons of the Company when he determines that a Director/Designated Persons can reasonably be expected to have possession of Unpublished Price Sensitive Information. Such closure shall be imposed in relation to such securities to which such Unpublished Price Sensitive Information relates.

6.3 The timing for reopening of the Trading Window shall not be earlier than 48 hours after the information becomes generally available.

6.4 The Trading Window shall also be applicable to any person having contractual or fiduciary relation with the Company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the Company.

7 PRE-CLEARANCE OF TRADES:

7.1 All Directors/Designated Persons, who intend to deal in the securities of the Company when the Trading Window is opened and the aggregate value in excess of Rs. 10,00,000/- (Rs. Ten Lakh Only) within calendar quarter then Director/Designated Person should ensure that he/she shall pre-clear the Trade as per the pre-clearance procedure described as under. For the purpose of computing limit of Rs. 10, 00,000/-, the trading by the Directors/Designated Person along with the immediate relatives shall be taken into consideration. However, no Director/Designated Person shall be entitled to apply for pre-clearance of any proposed trade if such person is in possession of Unpublished Price Sensitive Information even if the Trading Window is not closed and hence he shall not be allowed to trade.

- (i) An application may be made in the format, as attached (**FORM-E**) to the Compliance Officer indicating the estimated number of securities that the Directors/Designated Person intends to deal in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the Company in this behalf.



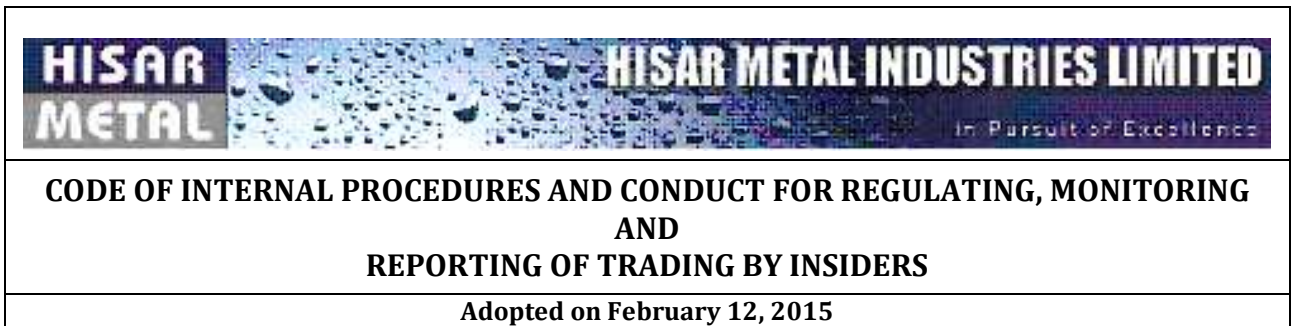
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- (ii) An undertaking shall be executed in favour of the Company by such Directors/Designated Person as attached (**FORM-E**) along with such application.
- (iii) All Directors/Designated Person execute their order in respect of securities of the Company within seven days after the approval of pre-clearance is given. If the order is not executed within seven days after the approval is given, the Directors/Designated Person must pre-clear the transaction again.

8 OTHER RESTRICTIONS:

- 8.1** The Directors/Designated Person shall, within seven trading days after the pre-clearance is given, execute the Trade in respect of which the preclearance has been accorded. If the Trade is not executed within seven trading days after the pre-clearance is given, the Directors/Designated Person, as the case may be, shall obtain pre-clearance again in accordance with the procedure detailed above.
- 8.2** The Directors/Designated Person and their immediate relatives who have traded in accordance with the provisions of this code shall not execute a contra trade within 6 (six) months of such trade.
- 8.3** In case the sale of Securities of HMIL is necessitated for reasons to be recorded in writing provided that such a regulation does not violate this Code, the minimum holding period as prescribed under paragraph may be waived by the Compliance Officer. If there is any contra trade in violation of such restrictions then the profit from such trade shall be liable to be disgorged for remittance to the Board for credit Investor Protection and Education Fund administered by the Board.
- 8.4** Trading in Securities of HMIL by the Directors/Designated Person shall be exclusively on delivery basis and no short selling shall be undertaken by them.
- 8.5** The Compliance Officer shall confidentially maintain a list of such securities as a “restricted list” which shall be used as the basis for approving or rejecting applications for preclearance of trades.



9. DISCLOSURE REQUIREMENTS FOR TRANSACTIONS IN SECURITIES:

9.1 General Provisions

- (i) Every public disclosure shall be made in the forms as prescribed under the Regulations from time to time.
- (ii) The disclosure to be made by any person under this code shall include those relating to trading by such persons immediate relative's, and by any other persons takes for whom such person takes trading decisions.
- (iii) The disclosure of trading in securities shall also includes trading in Derivatives of securities and traded value of the Derivatives shall be taken into account. Provided that trading in derivatives of securities is permitted by any law for the time being in force.
- (iv) The disclosure made under this part shall be maintained by the Compliance officer for a minimum period of 5 (five) years.
- (v) The Compliance Officer shall place before the Chairman of the Board on quarterly basis all the details of the trading in the Securities of HMIL by Promoters, Directors and Designated Persons and details of such persons who have submitted trading plans as envisaged in this Code.

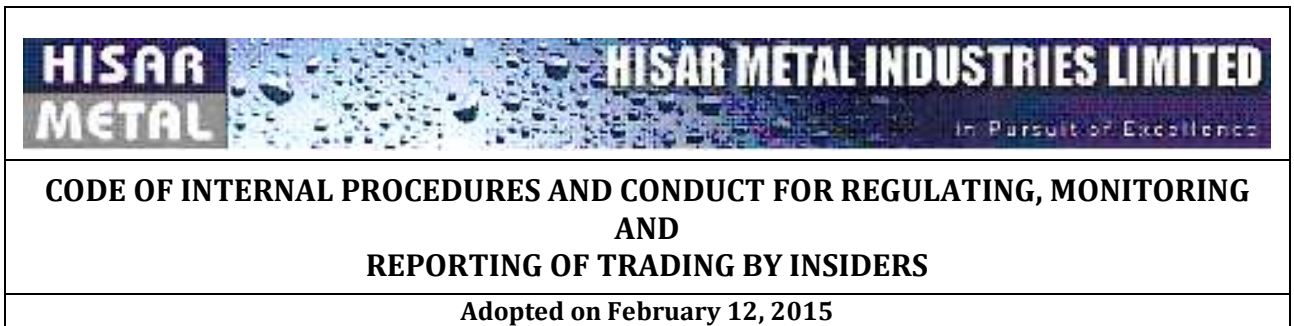
9.2 Initial Disclosure

Every Promoter/ Key Managerial Personnel / Director of the Company, within thirty days of these regulations taking effect, shall forward to the Company the details of all holdings in securities of the Company presently held by them including the statement of holdings of dependent family as per attached **(Form-A)**.

9.3 Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter shall disclose his holding of securities of the Company as on the date of appointment or becoming a Promoter, to the Company within seven days of such appointment or becoming a Promoter as per attached **(Form-B)**.

9.4 Continual Disclosure

Every Promoter, employee and Director of the Company shall disclose to the Company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. Ten lakhs or any other value as may be specified by SEBI insider Regulation as per attached **(Form-C)**.



9.5 Every Company shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.

9.6 Disclosures by other Connected Persons

HMIL may, at its discretion require any other Connected Person or class of Connected Persons to make disclosures of holdings and trading in securities of the Company in such form and at such frequency as may be determined by the Company in order to monitor compliance with these regulations as per attached **(Form-D)**

9.7 HALF YEARLY/ ANNUAL DISCLOSURE:

In addition to disclosures mentioned above all Directors and Designated Persons of the Company shall be required to forward following details of their securities transactions, including the holding of immediate relatives, to the Compliance Officer:

- (i) Statement of any transaction in securities of the Company, whether pre-clearance of trade was obtained or not, in **(Form-G)** on a half yearly basis within 15 days from the end of the half year, and
- (ii) Annual Statement of all holding in securities of the Company in **(Form-H)** as on 31st of each year, before April 15 of that year

10 PENALTY FOR CONTRAVENING ANY PROVISION:

In the event a Directors/Designated Persons or his/her immediate relatives, trade in Securities or communicates any information for trading in Securities in contravention of this Code or otherwise violates the provisions of this Code, such Person shall be referred to the Audit Committee of Directors. The Board may, on the recommendations of the Audit Committee, decide on the appropriate disciplinary action (which may include salary freeze, suspension etc.). Action taken by the Company for violation of these Regulations and Codes will not preclude SEBI from any action taken for violation of these Regulations or any other applicable/laws/rules/regulations.



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11 INFORMATION TO SEBI IN CASE OF VIOLATION OF SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS 2015:

In case it is observed by the Company/Compliance Officer that there has been a violation of these Regulations, SEBI shall be informed by the Compliance Officer within 7 days of knowledge of violation.

12 GENERAL:

Directors/Designated Persons are advised to read this Code and Regulations carefully and acquaint themselves with the provisions contained therein.

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FORM A

**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (a) read with Regulation 6 (2)]**

Name of the company: _____

ISIN of the company: _____

Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

To,
The Compliance Officer,
Hisar Metal industries Limited
Hisar


I, _____, in my capacity as _____ of the Company hereby submit the following details of securities held in the Company as on _____ May 15, 2015.

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/ immediate relatives/ others etc)	Securities held as on the date of regulation coming into force		% of Share holding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force	
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Signature:
Designation:

Date:
Place:


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FORM B

**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (b) read with Regulation 6(2)]**

Name of the company: _____

ISIN of the company: _____

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2).

To,
The Compliance Officer,
Hisar Metal industries Limited
Hisar.


I, _____, in my capacity as _____ of the Company hereby submit the following details on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2):

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters / KMP / Directors/ immediate relatives/others etc)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of Share-holding	Open Interest of the Future contracts held at the time of becoming Promoter/appointment of Director/KMP		Open Interest of the Option Contracts held at the time of becoming Promoter/appointment of Director/KMP	
			Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	6	7	8	9	10

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Signature:
Designation:

Date:
Place:


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FORM C
Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (2) read with Regulation 6(2)]

Disclosure of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned under Regulation 6(2)

Name of the company: _____
 ISIN of the company: _____

To,
 The Compliance Officer,
 Hisar Metal industries Limited
 Hisar

I, _____, in my capacity as _____ of the Company hereby submit the following details of change in holding of securities of the Company:


Name, PAN No., CIN/DIN, & address of Promoter/ Employee / Director with contact nos.	Category of Person (Promoters / KMP / Directors/ immediate relatives/ others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed		% of shareholding		Date of allotment advice/ acquisition of shares/ sale of shares specify	
		Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No.	Pre transaction	Post transaction	From	To
1	2	3	4	5	6	7	8	9	10

Date of intimation to company	Mode of acquisition (market purchase/public rights/ preferential offer / off market/ Inter-se transfer etc.)	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
		Buy		Sell		
		Value	Number of units (contracts * lot size)	Value	Number of units (contracts * lot size)	
11	12	13	14	15	16	17

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Signature:
 Designation:

Date:
 Place:


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FORM D
Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
Regulation 7(3) – Transactions by Other connected persons as identified by the company

Name of the company: _____
 ISIN of the company: _____

To,
 The Compliance Officer,
 Hisar Metal industries Limited
 Hisar

I, _____, in my capacity as _____ of the Company hereby submit the following details of change in holding of securities of the Company:


Name, PAN No., CIN/DIN & address of connected persons, as identified by the company with contact nos.	Connection with company)	Securities held prior to acquisition/disposal		Securities acquired/Disposed		% of shareholding		Date of allotment advice/ acquisition of shares/ sale of shares specify	
		Type of security (For e.g. – Shares, Warrants, Convertible e Debenture s etc.)	No.	Type of security (For e.g. – Shares, Warrants, Convertible e Debenture s etc.)	No.	Pre trans action	Post transa ction	From	To
1	2	3	4	5	6	7	8	9	10

Date of intimation to company	Mode of acquisition (market purchase/public rights/ preferential offer / off market/ Inter-se transfer etc.	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
		Buy		Sell		
		Value	Number of units (contracts * lot size)	Value	Number of units (contracts * lot size)	
11	12	13	14	15	16	17

Note: “Securities” shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Signature:
 Designation:

Date:
 Place:

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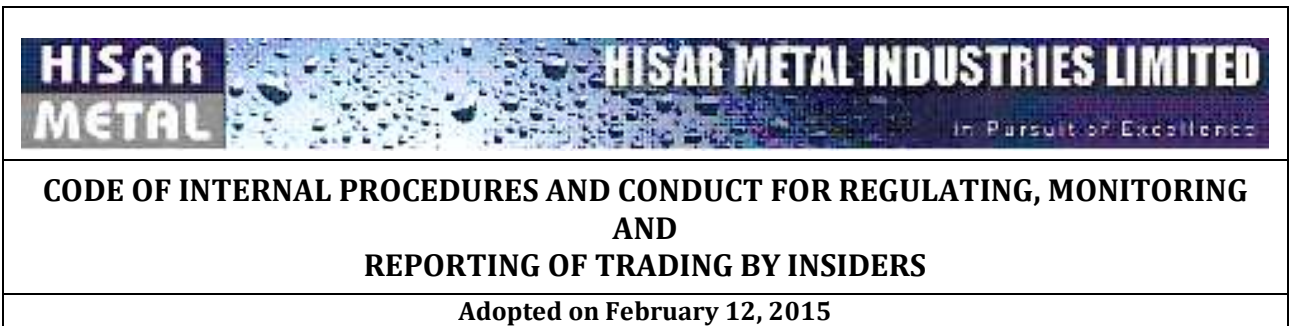
Form E
(Application for Pre-clearance of trading in securities of the Company)

The Compliance Officer
Hisar Metal Industries Limited
Near I.D.C., Delhi Road
Hisar - 125 005 (Haryana)

With reference above, I wish to inform you I am holding _____ Equity Shares (including Shares held by my immediate relatives) intend to deal in the Equity Shares of the Company exceeding the threshold limit as provided under the Code of Conduct to Regulate, Monitor and Reporting of Trading by Insiders.

Name of the applicant			
Designation			
Department			
PAN			
Name of immediate relative			
Relationship			
Pre-clearance for		*Purchase / Subscription / Sale	
Details of current holding	Particulars	Own	Relative
	Type of security		
	No. of securities		
	Mode of holding		
*Folio/ DP & Client IDs			
Details of proposed trade	Type of security		
	No. of securities		
	Proposed date		
	Mode of dealing		
	*Folio/ DP & Client IDs	*Physical / Dematerialized	
	Value of transaction		
	Current market value		
Mode of trade	*Through exchange / Off-market		
Total holding after proposed trade			

*strike whichever is not applicable



UNDERTAKING:

In this connection I solemnly confirm and declare that:

- a) I do not access and/or have not received any “Unpublished Price Sensitive Information” upto the time of signing the undertaking;
- b) In the event that I have access to or receive Unpublished Price Sensitive Information after signing of this undertaking but before the execution of the transaction for which I have sought pre-clearance, I shall inform you about the change in my position and that I shall refrain from trading in the Securities of the Company till such information becomes public;
- c) I have not contravened the provisions contained in this Code and in the Code of Practice and Procedure for fair disclosure of “Unpublished Price Sensitive Information” as notified by the Company from time to time;
- d) I hereby confirm that I abide the provisions of this Code with regards to time norms holding of securities of the Company;
- e) That I have made a full and true disclosure in the matter.
- f) I hereby declare that I shall execute my order in respect of securities of the Company within seven trading days after the pre-clearance is given. If the order is not executed within seven trading days after the approval is given, I shall obtain pre-clearance for the transaction again.

Signature:
Designation:

Date:
Place:



PRE - CLEARANCE ORDER

This is to inform you that your request for dealing in_____ (numbers) shares of the Company as mentioned in your above mentioned application is approved. Please note that the said transaction must be completed on or before_____ (date) that is within 7 days from today.

Date: _____ For Hisar Metal industries Limited
 Place: _____

 Compliance Officer

CONFIRMATION OF DEAL

The Compliance Officer,
 Hisar Metal industries Limited
 Hisar

I confirm that the shares dealing for which approval was granted on was Completed on..... for purchasing / selling (numbers) equity shares of the Company.


Employee Name:

Designation:

Place:

Date:

Signature

 <p>HISAR METAL INDUSTRIES LIMITED In Pursuit of Excellence</p>
<p>CODE OF INTERNAL PROCEDURES AND CONDUCT FOR REGULATING, MONITORING AND REPORTING OF TRADING BY INSIDERS</p>
<p>Adopted on February 12, 2015</p>

Form F
APPLICATION FOR WAIVER OF MINIMUM HOLDING PERIOD

Date:

To,
The Compliance Officer,
Hisar Metal industries Limited
Hisar

Dear Sir \ Madam,

With reference to above I wish to inform you that I had purchased _____ equity shares/other security of the Company on _____, the details are as mentioned below:


S. No.	Heading	Particulars
1	No. of equity shares/other security purchased	
2	Folio No./ DP & Client IDs	
3	Date and price of purchase	
4	From whom purchased	
5	Existing total holding	
6	Quantity want to sell	
7	Reason of sell	
8	Price at which I want to sell	
9	Mode of transaction- private/open market	

I understand that as provisions of the Code of Practice and Procedure and Code of Conduct to Regulate, Monitor and Report trading in securities and fair disclosure of Unpublished Price Sensitive Information pursuant to the requirement of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015(Code), I need to hold this investment for a minimum period of 6 months, but due to reasons as mentioned above, I need to sale the same before prescribed period.

Your are requested kindly give your permission to sale the aforesaid security as requested.

Signature:
Designation:

Date:
Place:

 <p>HISAR METAL INDUSTRIES LIMITED In Pursuit of Excellence</p>
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<p>Adopted on February 12, 2015</p>

**Form G
Half Yearly Disclosure**

The Compliance Officer,
Hisar Metal industries Limited
Hisar

With reference to the above, I wish to inform you that I along with my immediate relative are hold equity share/ Security of the Company as follow:

I. Statement of Shareholding

Name	Designation / Department.	No. of shares held on 1st April	No. of Shares bought during the half year	No. of Shares sold during the half year	No. of shares held on 30.09.20__	Folio No. / DP ID / Client ID.

II. Details of Shares held by immediate relative

Name of the Dependent Family Member	Relationship	No. of shares held on 1st April	No. of Shares bought during the half year	No. of Shares sold during the half year	No. of shares held on 30.09.20__	Folio No. / DP ID / Client ID.

I / We further declare that the above disclosure is true and correct and is in accordance with the previous disclosures given to the Company.

Signature:
Designation:

Date:
Place:



**CODE OF INTERNAL PROCEDURES AND CONDUCT FOR REGULATING, MONITORING
AND
REPORTING OF TRADING BY INSIDERS**

Adopted on February 12, 2015

**Form H
Annual Disclosure**

To
The Compliance Officer,
Hisar Metal industries Limited
Hisar

With reference to the above, I wish to inform you that I along with my immediate relative are hold equity share/ Security of the Company as follow:

I. Statement of Shareholding

Name	Designation / Department.	No. of shares held on 1st April	No. of Shares bought during the half year	No. of Shares sold during the half year	No. of shares held on 30.09.20__	Folio No. / DP ID / Client ID.

II. Details of Shares held by immediate relative

Name of the Dependent Family Member	Relationship	No. of shares held on 1st April	No. of Shares bought during the half year	No. of Shares sold during the half year	No. of shares held on 30.09.20__	Folio No. / DP ID / Client ID.

I / We further declare that the above disclosure is true and correct and is in accordance with the previous disclosures given to the Company.

Signature:
Designation:

Date:
Place: